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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

FLOWZ DIGITAL LLC, a Delaware Limited Liability Company; and

**Plaintiff,**

VS.

CAROLINE DALAL, an individual; and FLOWZ STAFFING LLC, a California Limited Liability Company; and DOES 1 through 20 inclusive;

### Defendants.

Case No.: 2:25-cv-709

**DECLARATION OF OMID E.  
KHALIFEH REGARDING USE  
OF ARTIFICIAL INTELLIGENCE  
IN OPPOSITION TO MOTION TO  
DISMISS**

1 I, Omid E. Khalifeh, declare as follows:

2       1. I am counsel of record for Plaintiff Flowz Digital LLC in the above-  
3 captioned action. I make this declaration pursuant to Section F.2 of the Court's Civil  
4 Standing Order and in response to the Court's Minute Order dated April 25, 2025,  
5 which requires disclosure of any use of generative artificial intelligence in the  
6 preparation of briefs or filings submitted to the Court.

7       2. A portion of the initial draft of Plaintiff's opposition to Defendants'  
8 Motion to Dismiss was prepared with the assistance of Lexis+ AI, a legal research  
9 tool developed by LexisNexis. The draft was developed collaboratively by me and  
10 my associate, Louise Jillian Paris, during the early stages of drafting. Lexis+ AI was  
11 used to assist in identifying potentially relevant legal authorities and organizing the  
12 legal structure of the arguments presented.

13       3. In addition to the use of Lexis+ AI, our team also consulted prior  
14 oppositions to motions to dismiss filed in unrelated matters before the United States  
15 District Court for the Central District of California. These filings contained case law  
16 and argument structures that were adapted in part for use in the present opposition.  
17 I had previously reviewed and verified the cited authorities at the time of their  
18 original use and determined that their continued use in this filing remained  
19 appropriate.

20       4. Following drafting, I reviewed, revised, and supplemented all portions  
21 of the brief, including those that were informed by the use of Lexis+ AI or based on  
22 prior templates. I independently verified the factual and legal accuracy of the content  
23 and confirmed that all arguments and authorities were appropriate to the issues  
24 presented.

25       5. I certify that the opposition brief, including all portions informed by  
26 artificial intelligence, complies with my obligations under Rule 11 of the Federal  
27 Rules of Civil Procedure.

6. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 1st day of May, 2025, in Los Angeles, California.

/s/ Omid E. Khalifeh

Omid E. Khalifeh